

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

Sitting at Tokyo, Japan

Case No. I

UNITED STATES OF AMERICA, et al

Prosecutors

- v -

Paper No. 720

ARAKI, Sadao, et al

Defendants

APPLICATION ON BEHALF OF ITAGAKI, Seishiro,  
FOR AN ORDER FOR PRODUCTION OF WITNESSES

Comes now the accused ITAGAKI, Seishiro, and makes known to this Tribunal that he is desirous of obtaining from this Tribunal an order and process for its production of the following named persons as witnesses in his behalf at this trial.

This application was not made earlier as required by this Tribunal for the following reasons:

In the case of the first three witnesses, their addresses, even probable, were not known until now. In the case of the second set of two witnesses, the matter concerning which these witnesses may testify did not arise until after the said accused had submitted his application for process.

Han Yun-chieh - Nationality is Chinese.  
Present address believed to be at  
ChungKing, China.

He was born in Manchuria and was carrying on business in several parts of Manchuria such as at Harbin until the outbreak of the Mukden Incident. After the incident he served the Manchukuo Government as the mayor of Sinkiang Special City. The Finance Minister of the new state and represented Manchukuo Government in Europe.

The facts concerning which this witness can give testimony are: - That as a native and resident of Manchuria during the period before and after the Mukden Incident he will be able to testify as to the unsettled and unsafe conditions of

civil life in Manchuria; that popular feeling was against Chang regime; that the independent state in Manchuria was but a creation of the Kwantung Army or any other Japanese organization, but that Manchukuo was demanded and created by the Manchurians themselves with the help and advice of the Kwantung Army and some Japanese civilians whose ideals were for the creation of concordia of races in Manchuria.

The relevancy of this testimony lies in that it will dispute the charge of Manchukuo being a puppet state of Japan and the claim that it was created as a result of a common plan of Itagaki and other defendants.

Kan Tzn Siang - Nationality is Chinese  
Present address - believed to be living in Peking, China.

Kan Tzn Siang was a native of Manchuria and was the head of a prefecture in Mukden Province before the Mukden Incident in 1931. He later served the Manchukuo Government as the Chief of the road construction section of civil engineering department of Civil Administration Office in 1935 and in 1937 he became the Chief of the Educational Department of Autung Province, in 1938 as the Vice-Chief of the General Affairs Department of the Manchukuo Government and then became the Minister of Civil Administration of the same government.

The facts concerning which this witness can give testimony are: - That as a native and resident of Manchuria during the period before and after the Mukden Incident he will be able to testify regarding the unsettled and unsafe conditions of civil life in Manchuria, that the popular feeling was against Chang's regime; that the independent state of Manchukuo was not a creation of the Kwantung Army or any other Japanese organization, but that Manchukuo was demanded and created by the Manchurians themselves with the help and advice of the Kwantung Army and some Japanese civilians whose ideals were for the creation of concordia of nations in Manchuria.

The relevancy of this testimony lies in that it will dispute the charge of Manchukuo being a puppet state of Japan and the claims of the prosecution that she was created as a result of a common plan of Itagaki and other defendants.

Chang Kai Yung - Nationality is Chinese.  
Present address - believed to be in Changchun, Manchuria.

He is a native of Fukien, China. He served the Manchukuo Government as a secretary to the commercial representative of Manchukuo in Europe for three years. After returning to Manchukuo he served as a Councilor of the Publication Department of the Government until the end of the war.



The facts concerning which this witness can give testimony are: - That as a native and resident of Manchuria during the period before and after the Mukden Incident he will be able to testify regarding the unsettled and unsafe conditions of civil life in Manchuria, that the popular feeling was against Chang's regime; that the independent state of Manchukuo was not a creation of the Kwantung Army or any other Japanese organization but that Manchukuo was demanded and created by the Manchurians themselves with the help and advice of the Kwantung Army and some Japanese civilians whose ideals were for the creation of concordia of nations in Manchuria.

The relevancy of this testimony lies in that it will dispute the charge of Manchukuo being a puppet state of Japan and the claim of the prosecution that she was created as a result of a common plan of Itagaki and other defendants.

Noguchi Yuzurn - Nationality is Japanese  
Government position - Colonel  
Present address - Sugamo Prison  
Tokyo

He was appointed the commander of the Prisoner of War Camp in Korea in 1942 and served as such up to the end of the war.

The facts concerning which this witness can give testimony are: - That he was the commander of the Prisoner of War Camp in Korea during almost the entire period of the Pacific War, and that he is able to describe the conditions of Prisoner of War Camp in Korea.

The relevancy of this testimony lies in that the defendant Itagaki was the Commander in Chief of the Korean Army from March 1941 to April 1945, and that he is charged for "some responsibility" for the mistreatment of Prisoners of War.

Uchida Goro - Nationality is Japanese  
Government position - Military doctor  
Present Address - Sugamo Prison  
Tokyo

He was assigned to be the doctor in charge of Prisoner of War Camp in Korea from the beginning of the establishment of such camp there until the end of war.

The facts concerning which this witness can give testimony are: - That he was the camp doctor during the entire period of the existence of Prisoner of War Camp in Korea and that he is able to testify the actual health condition of prisoners of war in Korea.

The relevancy of this testimony lies in that the defendant Itagaki was the commander in chief of the Korean Army from March 1941 to April 1945, and that he is charged for "some responsibility" for the mistreatment of prisoners of war.

ITAGAKI, Seishiro

By YAMADA, Honzo

SASAGAWA, Tomoji

BANNO, Junkichi

Floyd J. Mettice  
His Counsel